

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: JONATHAN BENNETT : CHAPTER 13
:
:
DEBTOR : BANKRUPTCY No. 18-15201

MOTION TO ABATE PAYMENTS AND MODIFY PLAN POST-CONFIRMATION

JONATHAN BENNETT, through his attorney, Zachary Perlick, Esquire, hereby moves for an Amendment of his Chapter 13 Plan Post-Confirmation, and sets forth in support thereof the following:

1. Debtor filed a voluntary Chapter 13 Petition on August 6, 2018; the Chapter 13 plan was confirmed on November 20, 2018.
2. Debtor lost income and fell behind in his payments to the trustee. Debtor's father was ill and unable to contribute to the household income.
3. Debtor will cure the post-petition amounts due to the Trustee over the remainder of the plan as called for in the modified plan which is being filed concurrently with this motion.
4. Debtor's confirmed plan required payments of \$899.00 each month for the remaining months of the plan. Debtor's modified Chapter 13 plan requires payments of \$700.00 each month for 54 months.
5. Debtor's modified plan extends the plan to 75 months.

Wherefore, Debtor requests that his Motion to Abate Plan Payments and Motion to Amend Plan Post-Confirmation be Granted.

Respectfully submitted,

/Zachary Perlick/

ZACHARY PERLICK, ESQUIRE
1420 Walnut Street, Suite 718
Philadelphia, PA 19102
(215) 569-2922